

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

MELANIE IVY,)	
)	
PLAINTIFF,)	
)	
vs.)	CIVIL ACTION No:
)	1:08-CV-2078-TCB
FORD MOTOR COMPANY,)	
)	
DEFENDANT.)	

**FORD MOTOR COMPANY'S MOTION FOR LEAVE OF COURT
TO FILE STATEMENT OF MATERIAL FACTS**

COMES NOW, defendant Ford Motor Company, and respectfully moves the Court for leave to file its Statement of Material Facts, and shows the Court as follows:

1. Ford drafted its Statement of Material Facts to Which There is No Genuine Issue to be Tried on May 28, 2009.

2. Ford intended to file its Statements of Material Facts along with its Partial Motion for Summary Judgment, which was filed on May 28, 2009. However, Ford inadvertently failed to include its Statement of Material Facts when it filed its Partial Motion for Summary Judgment.

3. Enclosed with this Motion for Leave is the Statement of Material Facts that Ford intended to file with its Partial Motion for Summary Judgment.

4. Granting Ford's request for Leave will, in no way,

prejudice the Plaintiff, because Ford's Statements of Facts are recited (virtually verbatim) in Ford's Partial Motion for Summary Judgment.

WHEREFORE, Ford respectfully requests Leave of Court to file its Statement of Material Facts to accompany its Partial Motion for Summary Judgment.

This 8th day of July, 2009.

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FONT CERTIFICATE

I hereby certify that this pleading was prepared using a font and point selection approved by the Court in Local Rule 5.1C.

/s/ Suneel C. Gupta
Suneel C. Gupta, Esq.

CERTIFICATE OF SERVICE

This is to certify that I electronically filed the foregoing FORD MOTOR COMPANY'S MOTION FOR LEAVE OF COURT using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

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This 8th day of July, 2009.

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